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August 10, 2021

Via ECF Filing

The Honorable Ramon E. Reyes, Jr.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**RE: *Kaikov v. Kaikov, et. al.*, Case No. 19-cv-2521- LDH-RER
Joint Motion to Extend Discovery Deadlines**

Dear Judge Reyes:

I am counsel for Plaintiff in the above-referenced matter. I am writing on behalf of all parties to jointly respectfully request the Court to extend the expert discovery deadlines to allow Plaintiff to complete depositions of Defendants' accountant and corporate Defendants prior to producing expert report. Defendants respectfully request (and Plaintiff does not oppose) that the Court reopens fact discovery to allow Defendants to complete depositions of the non-party witnesses for the reasons set forth below.

This is a fourth request for extensions of the discovery deadlines. There are no set deadlines other than a status conference set for August 11, 2021 and pre-trial conference set for December 1, 2021.

On April 26, 2021, the Court issued a minute order extending time to complete deposition discovery until June 30, 2021. Plaintiff's expert report is currently due on August 30, 2021.

To date, the parties have completed a number of depositions of Plaintiff, Defendant, and third-party witnesses. Plaintiff has completed most of its planned depositions, other than the ones that were contested. The remaining depositions Plaintiff will take are of the corporate Defendants (*see* July 28, 2021 Minute Order denying Defendants' motion for protective order) and a deposition of Defendant's accountant if the objection regarding documents from the accountant is overruled (*see* Minute Order, dated July 8, 2021). Due to counsel and parties' schedules, the plan is to take the corporate Defendants' depositions in September – early October. Deposition testimony such as regarding expenses paid for the renovating of the properties will be used by Plaintiff's damages expert in preparing his report. Thus, Plaintiff requests an extension of expert discovery deadlines, as set forth below.

THE HONORABLE RAMON E. REYES, JR.

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Defendants are requesting to reopen deposition discovery to take testimony of Rakhmine Kaikov and Elena Kaikov. Given counsels' schedules and location of witnesses, Defendants request until October 30, 2021 to complete the depositions. Plaintiff does not object to this request.

Accordingly, the parties jointly request that the discovery deadlines be extended as follows:

Depositions discovery	October 30, 2021
Plaintiff's expert report	December 31, 2021
Defendants' Counter	February 28, 2022
Expert Depositions	April 15, 2022.

We thank the Court for its time and effort in consideration of this matter.

Respectfully submitted,

/s/ Maria Temkin

Maria Temkin, Esq.

For: TEMKIN & ASSOCIATES, LLC

MT

Cc: All counsel of record (via ECF System)

